

**To:** LEE, LILY[LEE.LILY@EPA.GOV]  
**From:** Walker, Stuart  
**Sent:** Mon 3/21/2016 2:17:04 PM  
**Subject:** FW: request re conference call April 12

Hi Lily, can we discuss what this is about?

**From:** Daniel Hirsch [mailto:dohirsch@ucsc.edu]  
**Sent:** Sunday, March 20, 2016 10:57 PM  
**To:** LEE, LILY <LEE.LILY@EPA.GOV>  
**Cc:** Walker, Stuart <Walker.Stuart@epa.gov>; Janice Davis <jadadavi@ucsc.edu>; Lucien Martin <lumamart@ucsc.edu>; Maria Caine <mcaine@ucsc.edu>; Janie Flores <jalflore@ucsc.edu>; Liora Huebner <lhuebner@ucsc.edu>; Flora Lu <floralu@ucsc.edu>; bradley@greenaction.org  
**Subject:** request re conference call April 12

Hi Lily,

We would appreciate it if you would arrange for Stuart Walker, the EPA Superfund remedial program's National Radiation Expert, to participate in the conference call on Hunters Point issues scheduled for April 12.

We note that "Radiation Risk Assessment at CERCLA Sites Q&A," (EPA Office of Superfund Remediation and Technology Innovation Directive 9200.4-40, May 2014) states:

**"Q10. For CERCLA risk assessments at remedial sites, is it appropriate to use guidance or approaches developed by other Federal, State or Tribal Agencies or by International or National Organizations?"**

A. EPA has made the policy decision that risks from radionuclide exposures at remedial sites should be estimated in the same manner as chemical contaminants, which is consistent with EPA's remedial program implementing guidance (e.g., EPA 1997g, 1999d, 2000f). Consequently, approaches that do not follow the remedial program's policies and guidance should not be used at CERCLA remedial sites. Should regional staff have questions, they should consult with the Superfund remedial program's National Radiation Expert (Stuart Walker of OSRTI at the time this fact sheet was issued, at (703) 603-8748 or [walker.stuart@epa.gov](mailto:walker.stuart@epa.gov)), before using guidance from other organizations that is not already incorporated into this and other EPA Superfund remedial program guidance."

Among the issues we wish to explore during the conference call is whether remediation standards, models, and other guidance were used at Hunters Point that are inconsistent with the

EPA remedial program's policies and guidance. If so, we would like to understand whether EPA Region IX consulted with Mr. Walker before allowing use of guidance that is not incorporated in EPA Superfund remedial program guidance, and if so, on what basis the approvals were made. If there was no consultation with Mr. Walker, we would like to learn why not.

Thank you.

Daniel Hirsch  
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Program on Environmental and Nuclear Policy  
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